Bruce W. Radowitz, Esq 636 Chestnut Street Union, New Jersey 07036 (908) 687-2333 BRUCE W. RADOWITZ, ESQ.

Attorney for Debtor

In the matter of:

Elijah Johnson, Sr

Debtor(s)

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

Case No: 15-11904/VFP Chapter 13

## APPLICATION FOR AN ORDER TO CONTINUE THE AUTOMATIC STAY AS TO REAL PROPERTY

## TO: HONORABLE VINCENT F. PAPALIA UNITED STATES BANKRUPTCY JUDGE

Your applicant, Elijah Johnson, Sr (s) herein, by and through his attorney, Bruce W. Radowitz, Esq., respectfully represents:

- 1. A Chapter 13 Bankruptcy case was filed February 3, 2015.
- 2. The Debtor's had a prior Chapter 13 Bankruptcy case dismissed within the last one year. Therefore, the Automatic Stay under section 362 of the Bankruptcy Code is only in effect for thirty (30) days unless continued by Order of the Court.
- 3. The prior case failed because the Debtor had unforeseen expenses due to other family commitments. As such, the Debtor had to re-direct available funds to obligations other than those of the Bankruptcy case.
- 4. As of the date of the filing of this present case, the other obligations are resolved and therefore, this case should be able to move forward without issue.

WHEREFORE, it is respectfully requested that the Court enter an Order Continuing the Automatic Stay beyond the thirty (30) days as provided by section 362 to the Bankruptcy Code.

Bruce W. Radowitz, Esq Attorneys for the Debtor(s)

By: /s/ Bruce W. Radowitz

.